



# State of Utah

## DEPARTMENT OF ENVIRONMENTAL QUALITY DIVISION OF AIR QUALITY



10904 AIR

SSIU/E

Michael O. Leavitt  
Governor

Dianne R. Nielson, Ph.D.  
Executive Director

Ursula K. Trueman  
Acting Director

150 North 1950 West  
P.O. Box 144820  
Salt Lake City, Utah 84114-4820  
(801) 536-4000 Voice  
(801) 536-4099 Fax  
(801) 536-4414 T.D.D.

### Certified Mail

DAQC-1324-96

September 6, 1996

Craig N. Thatcher  
Thatcher Chemical Company  
P.O. Box 27407  
1905 Fortune Road  
Salt Lake City, Utah 84127

Dear Mr. Thatcher:

Re: **THATCHER CHEMICAL COMPANY - ORDER TO TEST** - Section 3.4.1, Utah Air Conservation Rules (UACR) and Condition 19-C of the Approval Order (AO) dated September 21, 1994 - Thatcher Chemical Company - Salt Lake County

On August 14, 1996, three inspectors from the Division of Air Quality (DAQ) conducted an audit of the Sulfur Dioxide (SO<sub>2</sub>) scrubber stack analyzer. During this audit, gasses were drawn from the stack indicating that an exceedance of the emission limitations in AO Condition 19-C may exist.

UACR Section 3.4.1 states in part:

"If the executive secretary has reason to believe that an applicable emission limitation is being exceeded, he may require the owner or operator to perform such emission testing as is necessary to determine actual compliance status."

In accordance with Section 19-2-107 (2) (g) of the Utah Code Annotated, the executive secretary hereby **ORDERS** Thatcher Chemical Company to determine the sulfur dioxide emissions from the SO<sub>2</sub> scrubber stack using EPA Reference Method 6 within 20 days of receipt of this letter. A Pre-test Protocol must be submitted to the Executive Secretary within 10 days of receipt of this letter.

This **ORDER TO COMPLY** is based on the observations documented by the DAQ inspectors. Please be advised that compliance with this **ORDER** is mandatory and will not relieve the company of liability for any past violations.

This ORDER is effective immediately and shall become final unless Thatcher Chemical Company requests, in writing, a hearing within thirty (30) days pursuant to Utah Code Annotated 19-2-110. Section 19-2-115 of the Utah Code Annotated provides that violators of the Utah Air Conservation Act and/or any ORDER issued thereunder may be subject to a civil penalty of up to \$10,000.00 per day for each violation.

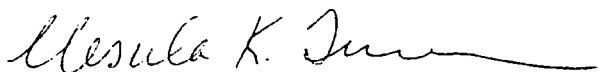


DAQC-1324-96

Page 2

Furthermore, The Division of Air Quality now withdraws the previous terms offered for settlement of the April 8, 1996, Notice Of Violation. Questions regarding this matter may be directed to Jay Morris at (801) 536-4079.

Sincerely,



Ursula K. Trueman, Acting Executive Secretary  
Utah Air Quality Board

UKT:JPM:ts

cc: ~~Department of Environmental Quality, Dianne R. Nielson~~  
~~EPA Region VIII, Lee Hanley~~  
~~Salt Lake City/County Health Department~~